

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

14 CR. 368 (JFK)

Plaintiff, :

- against - :

STEPHEN CLEMENTS, :

Defendant. :

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**DEFENDANT STEPHEN CLEMENTS'S
SUPPLEMENTAL SENTENCING MEMORANDUM**

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November 5, 2015

By ECF

The Honorable John F. Keenan
Senior United States District Judge
United States Court House
500 Pearl Street
New York, NY 10007

Re: United States of America v. Stephen Clements
14 Cr. 368 (JFK) (USMC-SDNY)

Dear Judge Keenan:

I submitting this letter to supplement the Sentencing Memorandum filed on Friday, October 30, 2015 on behalf of my client, Stephen Clements. Attached to this letter is a copy of a handwritten letter from a long time friend to Mr. Clements. It arrived too late to include in my submission on Friday. I respectfully request that Your Honor take this additional moving letter into consideration in determining the appropriate sentence for Mr. Clements.

Thank you for your consideration.

Respectfully submitted,



Walter Mack

cc: AUSA Emil Bove
(via email)

Gregory P. Suchanyc

October 27, 2015

Your Honor:

I am writing to urge leniency in the sentencing of my friend Stephen Paul Clements.

I have known Steve for more than 17 years, since he did part time computer work for my free-lance business in my home so many years ago. His knowledge of the Microsoft programs helped my business as well as myself. Steve showed so much patience in teaching an old dog new trick so to speak, since I had no computer knowledge at all at that time. Through time Steve and I got to know one another as close friends. He and I are both aware of the gravity of the crime he was convicted of, but it is still hard for me to comprehend that it has come to this situation. This is not the Steve I know, and I'd like to give you a perspective that shows that he is more than the sum of his actions on the day that he committed the crime.

Steve has been my current house mate for the last three years. In this time he has been helpful to me and willing to lend a hand with any physical work i needed inside or outside of my home. Steve had a great position for many years with the same company as a sales representative. He was with the same Aerospace company when I first met him 17 years ago and has been with the same company until over a year ago when he lost his job. Working as a young man for the same company until his mid thirties goes to show the type of loyalty Steve has as a productive part of our working society.

Steve is the first to admit that he has a drug problem. In the past year, I could see how much he struggled through his time in a rehab center to his many days of drug counseling after his initial release from the hospital. Steve was so determined to stay clean and get back to his normal life again. After his hospital stay, he immediately got a position with a painting/construction company located in Manhattan. I could see the gradual change in him now that he was sober and working again. This new type of hands on work he was doing was being taught to him by his current employer. Each new job was a learning experience for Steve. He would come home excited and brag to me on what he learned and did for that days work. One of his most proud moments last spring was putting in a real wooden floor in a clients home. He actually brought home a few scrap pieces and wrote on the back the date and place where the floor he installed was located.

In writing this letter, I hope I have shed some light on the positive, kind hearted and hard working man that I have seen Stephen grow into over the last 17 years. I know that Steve will become once again a hard working part of our society always striving to make a difference. I strongly believe that a lesser sentence is most appropriate in this situation.

Sincerely,
Gregory P. Suchanyc